

## STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

December 17, 1991

Mr. Daniel Duncan 183-H Unit Manager U.S. Environmental Protection Agency 1200 Sixth Avenue Seattle, Washington 98101

RE: 183-H Solar Evaporation Basins Closure Plan

Dear Mr. Duncan:

I have reviewed the U.S. Department of Energy's 183-H Solar Evaporation Basins Closure/Postclosure Plan (Revision 3). The Revision 3 document consists of the Revision 2 document updated with Revision 3 page changes. It is Ecology's intention to approve this plan with the conditions identified in the enclosure to this letter. I request that the EPA review the closure plan and the conditions enclosed with this letter for technical, regulatory, and legal completeness. I am available to discuss any concerns the EPA might have based upon this review and would appreciate written comments on the issues of concern.

Please contact me in the next few days letting me know when I might expect the EPA's review to be complete. I can be reached at (206) 438-7557.

Joseph(J) Witczak 181-H Unit Manager

Permitting and Compliance Unit

Enclosure

 $\bigcirc$ 

n:

S

6

cc: Dave Nylander Toby Michelena



S

## ENCLOSURE

## CONDITIONS TO THE 183-H SOLAR EVAPORATION BASINS CLOSURE PLAN

- 1. Closure of the 183-H Solar Evaporation Basins (Basins) shall be conducted as set forth in Revision 3 of the 183-H Solar Evaporation Basins Closure/Postclosure Plan (Plan) to include the following conditions and any approved modifications. Any conflict between the Plan and these conditions will be resolved in favor of the conditions.
- 2. Page I-1, lines 9-12. This sentence is modified to read "Additionally, the 183-H Basins will be closed in accordance with the most current version of all applicable environmental regulations, laws, and guidance documents and the Hanford Federal Facility Agreement and Consent Order."
- 3. Page I-108, line 46. The reference to WAC 173-303-700 is deleted.
- 4. Page I-150, line 53. The date of October 1991 is changed to October 1992.
- 5. A copy of any Unusual Occurrence Reports issued after approval of the Plan which are directly related to the Basins shall be provided to Ecology and EPA within 7 calendar days after issuance.
- 6. Annual closure cost estimates shall be provided to Ecology and EPA as described in Section I.C-4 of the closure plan.
- 7. A written notification that closure has begun and will be conducted in accordance with the Plan, including the conditions to the Plan, shall be submitted to Ecology and EPA within 90 calendar days after the plan is approved.
- 8. A copy of the final concrete sampling and analysis plans (basin and background sampling) shall be submitted to Ecology and EPA by March 1, 1992.
- 9. A copy of the final soil sampling and analysis plans (including Phases I and II, and background sampling) shall be submitted to Ecology and EPA by March 1, 1992.
- 10. The results of Basin concrete sampling (including background sampling) shall be submitted to Ecology and EPA by April 1, 1992. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.
- 11. The results of Basin soil sampling (including Phase I, Phase II and background sampling) shall be submitted to Ecology and EPA by April 1, 1992. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.
- 12. Ecology and EPA shall be provided a sampling plan and the date of sampling for any sampling event not addressed above which provides data used to support Basin closure activities at least seven calendar days prior to initiating actual sampling activities. This condition applies to, but is

not limited to, sampling of equipment and non-concrete structural sampling and verification sampling.

- 13. A notification of the decision to clean close or close as a landfill shall be submitted to Ecology and EPA at least 60 calendar days prior to implementation of the option. This notification shall be accompanied by the technical and regulatory justification for choosing the closure option along with any supporting documentation. Implementation of the desired option cannot commence until receipt of Ecology's written approval of the closure option.
- 14. If this unit is to be closed as a landfill, the definitive design documents, construction specifications, construction drawings, and construction quality assurance plans for any engineered system (including a final cover system) shall be submitted Ecology and EPA at least 90 calendar days prior to construction of the system.
- 15. After review of the documents identified in condition 13, Ecology will write a unit-specific Construction Inspection Policy (CIP). Ecology shall be provided with all submittals and notifications required by the CIP and within the timeframes identified in the CIP.
- 16. The owner and independent engineer certifications of closure shall be prepared and submitted to Ecology and EPA by registered mail within 60 calendar days of closure as described in Section I.C-1 of the closure plan.
- 17. If this unit is to be closed as a landfill, a survey plat shall be prepared and submitted to Ecology, EPA, and the Benton County Planning Department no later than 60 calendar days after certification of closure as described in Section I.C-2 of the Plan.
- 18. If this unit is to be closed as a landfill, a notice on the deed to the property shall be prepared and submitted to the Auditor of Benton County no later than 60 calendar days after certification of closure as described in Section I.C-3 of the Plan. No later than 30 calendar days after submitting this notice, a certification signed by the facility owner must be submitted to Ecology and EPA that the notification has been recorded along with a copy of the document in which the notation has been placed.
- 19. Quarterly and annual groundwater monitoring reports shall continue to be submitted to Ecology and EPA.
- 20. If this unit is to be closed as a landfill, notification of any of the following occurrences shall be provided to Ecology and EPA within 30 calendar days of observance until a Postclosure Permit is issued: settlement/sedimentation in the final cover greater than 1 foot; actual vegetative cover canopy on the final cover less than 50% of an achievable 10% cover canopy 2 years after closure; erosion of the final cover greater than 6 inches; tampering or damage to wells or well heads. The notification must include the extent and cause of the occurrence as well as actions taken (or to be taken) to mitigate the occurrence.